

Transcript of the Testimony of Felipe de Jesus Avila-Soto

Date: December 16, 2025

**Felipe de Jesus Avila-Soto, et al v. South Central
Sugarcane Growers Association, et al**

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EXHIBIT

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

FELIPE DE JESUS
AVILA-SOTO, and
others similarly
situated,

Plaintiffs

VERSUS

SOUTH CENTRAL SUGARCANE
GROWERS ASSOCIATION AND
STERLING SUGARS, LLC

Defendants

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* CIVIL ACTION
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* NO. 6:24-CV-01392
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Deposition of FELIPE DE JESUS AVILA-SOTO,
taken through an interpreter, on the 16th day of
December. The witness and Mr. Morton and Mr.
Davis attended the deposition in person at the
Hotel Azul Talavera Country Club, Parque
Industrial Lajat, 27259 Torreon, Coah; Ms.
McDiarmid, Mr. Knoepp, the court reporter and
interpreter attended remotely, via Zoom.

APPEARANCES:

LAW OFFICES OF DAWSON MORTON
(By: Dawson Morton, Esquire
1808 Sixth Street
Berkeley, California 94710
(dawson@dawsonmorton.com)

- and -

James C. Knoepp, Esquire
1612 Crestwood Drive
Columbia, South Carolina 29205
(Attended remotely)

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1 APPEARANCES CONTINUED:

2

PHELPS DUNBAR
(By: Brandon Davis, Esquire)
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Suite 2000
New Orleans, Louisiana 70130

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- and -

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PHELPS DUNBAR
(By: Molly McDiarmid, Esquire)
400 Convention Street
Suite 1100
Baton Rouge, Louisiana 70802
(Attended via Zoom)

9

10 Attorneys for Defendants

11

INTERPRETER:

12

Amelia Smith
TNOLA Translations

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14

REPORTED BY:

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Cathy Renee' Powell, CCR
Professional Shorthand Reporters
(504) 529-5255

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EXAMINATION INDEX

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EXAMINATION BY MR. DAVIS5

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INDEX OF EXHIBITS

23

Exhibit No. 151

24

Mexican passport and visa information,

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SCSCGA 000013, 000014; 000021, 000022.

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1 can hear the audio; that is not the issue.

2 THE INTERPRETER:

3 I apologize; for me, the audio is
4 not clear at all, and the witness is
5 talking very quickly. I believe I should
6 call my office and have another interpreter
7 take over.

8 MR. MORTON:

9 I don't think it is an audio
10 problem either. I appreciate your
11 comments, Mr. Davis, I just wholly disagree
12 with them.

13 Nonetheless, if we go off the
14 record for a second, take a 10-minute
15 break, let Amelia call her office; and if
16 someone wants to stay on, we can also try
17 out the laptop microphone.

18 (Discussion off the record; thereafter,
19 the deposition was adjourned.)

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WITNESS' CERTIFICATE

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I have read or have had the foregoing

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testimony read to me and hereby certify that it

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is a true and correct transcription of my

10

testimony with the exception of any attached

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corrections or changes.

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FELIPE AVILA-SOTO

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PLEASE INDICATE

21

() NO CORRECTIONS

22

() CORRECTIONS; ERRATA SHEET(S) ENCLOSED

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REPORTER'S CERTIFICATE

This certification is valid only for a transcript accompanied by my original signature and original required seal on this page.

I, Cathy Renee' Powell, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that FELIPE AVILA-SOTO, after having been duly sworn by me upon authority of R.S. 37:2554, did testify as hereinbefore set forth in the foregoing 92 pages; that this testimony was reported by me in the stenotype reporting method, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board, that I have acted in compliance with the prohibition on contractual relationships, as defined by Louisiana Code of Civil Procedure Article 1434 and in rules and advisory opinions of the board; that I am not related to counsel or the parties herein, nor am I otherwise interested in the outcome of this matter.

CATHY RENEE' POWELL
CERTIFIED COURT REPORTER